

**ORIGINAL**

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PLUNKETT TO INTERROGATORY OF  
PITNEY BOWES, INC.  
(PB/USPS-T5-1)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of Pitney Bowes, Inc.: PB/USPS-T5-1, filed on August 21, 1998.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

*David H. Rubin*

David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
August 24, 1998



**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES  
OF PITNEY BOWES**

**PB/USPS-T5-1**

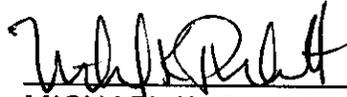
- a. Is Exhibit A to your response to OCA/USPS-T5-21(a) based on the prices and terms of Contract No. 102590-98-B-H025 (The MOL Printing Contract)?
- b. If not, please provide information in the format of that exhibit reflective of prices and terms of the MOL Printing Contract, with a complete explanation of your calculation, with references to such contract as appropriate.

**PB/USPS-T5-1 Response.**

- a. No. Contract terms were not available at the time that response was prepared.
- b. See my response to OCA/USPS-T5-28.

**DECLARATION**

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

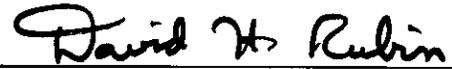


\_\_\_\_\_  
MICHAEL K. PLUNKETT

Dated: August 24, 1998

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin  
David H. Rubin

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August 24, 1998